

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 18-15750-elf
Lucille Long	: Chapter 13
Debtor	:
U.S. Bank Trust National Association, not in	:
its individual capacity but solely as owner	:
trustee for Loan Acquisition Trust 2017-RPL1	:
c/o Rushmore Loan Management Services,	:
LLC	:
Movant	:
vs.	:
Lucille Long	:
Debtor/Respondent	:
and	:
William C. Miller, Esquire	:
Trustee/Respondent	:

**OBJECTION TO CONFIRMATION OF THE PLAN**

U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for Loan Acquisition Trust 2017-RPL1 c/o Rushmore Loan Management Services, LLC (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtor, Lucille Long (“Debtor”), as follows:

1. As of the bankruptcy filing date of August 30, 2018, Movant holds a secured Claim against the Debtor’s property located at 5641 Belmawr Street, Philadelphia, PA 19143.

2. Movant has filed a Proof of Claim #8 on October 15, 2018, with pre-petition arrears in the amount of \$715.08.

3. The Plan currently proposes payment to Movant in the amount of \$0.00 for pre-petition arrears.

4. The Plan does not provide for the payment of monthly, post-petition mortgage payments in the amount of \$284.29.

5. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).

6. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtors' Chapter 13 Plan.

Respectfully submitted,

Dated: 10/15/2018

/s/Danielle Boyle-Ebersole, Esquire  
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